

**JOHN DOE,**  
  
**Plaintiff,**  
  
**v.**  
  
**WASHINGTON AND LEE UNIVERSITY**  
  
**Defendants.**

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) **Civil Action No. 6:19-CV-00023**  
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Defendant Washington and Lee University respectfully moves this Court to dismiss with prejudice Counts III and IV of Plaintiff's Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. For reasons stated in the accompanying memorandum of law, these Counts fail to state claims upon which relief can be granted.

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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 15<sup>th</sup> day of July 2019, a true copy of the foregoing was filed with the Court using the CM/ECF system, which will send notification of such filing to the following:

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